Supreme Court, U.S.
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No. _____

In the Supreme Court of the United States

PAUL C. FRENCH

Petitioner,

v.

SHIRLEY JACKSON, ET AL.,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Sixth Circuit

PETITION FOR WRIT OF CERTIORARI

PAUL C. FRENCH

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QUESTIONS PRESENTED FOR REVIEW

ISSUE ONE

Does the Rooker-Feldman Doctrine override the Fourteenth Amendment as to Equal Protection and Due Process and more specifically on the Narrow Issue Concerning the Violation of Judicial Process and Procedure in State Court's, that results in the violation of Constitutional Guarantees and Federal Case Law, is Federal Review prevented by the Rooker-Feldman Doctrine?

ISSUE TWO

Are "governmental agents" in the performance of their official duties protected by unlimited Governmental immunity when intentionally engaging in illegal activity and negligent omissions?

ISSUE THREE

When an attorney or law firm representing Governmental Agencies, including those of the State of Michigan, [or lawful counties thereof], goes beyond the role of a "zealous advocate for his [their] clients" and become an active co-conspirator in the cause of their clients, is not that attorney or firm acting improperly under "Color of Law"?

PARTIES TO PROCEEDING

Petitioner: Paul C. French, Jr. (French) An individual and a non-attorney Shirley Jackson, Clerk [now retired] Van Buren County [State of Michigan] individually and severally with; Van Buren County, a governmental instrumentality of the State of Michigan, jointly and severally with; Dale Gribler, Sheriff of Van Buren County, State of Michigan, in his Official capacity, jointly and severally, are represented by Attorney Camille T. Horne (P59547), Plunkett & Cooney, Buhl Building, 535 Griswold, suite 2400, Detroit, Michigan, 48226-3684, phone (313) 983-4796 [Van Buren County, et al], all jointly and severally with other respondents herein;

Richard H. Winslow, attorney, (P22449) individually and severally with other respondents herein. Attorney Winslow is represented by Attorney Joseph Nimako (P47313), Cummings, McClorey, Davis & Acho, PLC. 33900 Schoolcraft Road, Livonia, Michigan, 48150, Phone (724) 261-2400;

Cummings, McClorey, Davis & Acho, PLC, a Law Firm in the State of Michigan, the "Firm" as an entity, jointly and severally with all other respondents herein. The firm is represented by Attorney Ethan Vinson (P26608) Cummings, McClorey, Davis & Acho, PLC. 33900 Schoolcraft Road, Livonia, Michigan, 48150, Phone (724) 261-2400;

George N. Stevenson, (P38795) Assistant Attorney General for the State of Michigan, individually and in official capacity, jointly and severally with; Paul Fischer (P35454), Executive Director, Judicial Tenure Commission, in his official capacity, jointly and severally with; John D. Ferry, State Court Administrator, individually and in his official capacity, jointly and severally, with the other responders

herein. George Stevenson, Paul Fischer and John Ferry are collectively represented by Attorney James Erwin Long (P53251) Assistant Attorney General for the State of Michigan, Public Employment and Elections Division of the Office of the Attorney General for the State of Michigan, P. O. Box 30736, Lansing, Michigan, 48909, Phone (517) 373-6436

Petitioner, as an individual, is not subject to Rule 29.6, concerning a Corporate Disclosure Statement.

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PETITION FOR WRIT OF CERTIORARI

Petitioner Paul C. French, Jr., a non-attorney, in pro per, respectively petition for a writ of *certiorari* to review De Novo the judgment of the United States Court of Appeals for the Sixth Circuit.

OPINIONS BELOW

The Federal District Court

The United States District Court in Kalamazoo, Michigan, dismissed Petitioner's Complaint, finding no merit and ordering sanctions in the amount of $500.00.

This finding of the Federal District Court Petitioner asserts, was based upon other case law that concerned facts and circumstances different than the facts and circumstances at issue in Petitioner's Complaint. This opinion (app. d) and their order (app. c) found in favor of defendants by:

> Improperly dismissing the complaint on the basis of FRCP 12(b)(6) stating that it is clear no relief could be granted under any set of facts that could be proved consistent with the allegations, when in fact there was ample evidence to the contrary.
>
> Finding that, contrary to Appellant's assertion that Appellant's Complaint **was not** challenging an order of the State Court of Competent Jurisdiction, but rather asserting that the judicial process or procedure was violated, the primary issues were (contrary to

Appellant's assertion[1]), a challenge to the judgment of the State Court of Competent Jurisdiction and therefore was barred by the Rooker-Feldman Doctrine.

Ruling that Appellant had failed to exhaust all State Remedies while improperly ignoring *Roy Heck v James Humphrey Et Al.* S. Ct. 93-6188 [PP. 16 Pg. 2] that stated "exhaustion of state remedies is not a requirement to an action under 42 U. S. C. § 1983".See also *Patsy v Board of Regents of Florida,* 457 U.S. 196, 501, Ed. 2d 172,102 S. Ct. 2557

Holding that Appellant failed to alleged that state Remedies were inadequate, while Appellant had raised that very issue by stating any successful state appeal would bring the case back to the same Circuit Court Judge who had a personal bias of many years as revealed in a personally handwritten Order of Disqualification because of a personal bias along with an inability to find Appellant credible. (See App. # f). Returning a successful appeal to the very judge that

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[1] "This complaint concerns the violation of judicial process and procedures by various "State Actors" which so tainted the judicial process resulting in numerous and intentional violations of the Fourteenth and other Amendment protection for French. Such assertions are not barred by the Rooker Feldman Doctrine as this complaint is not a challenge to an Order of a State Court of Competent Jurisdiction but the process. See PP 402 Page 159 of the Complaint in the U.S. District Court. This violation by "State Actors" is repeatedly asserted in the Complaint and confirmed by very detailed proofs. This issue is clearly raised on page 3 under issue one and through-out French's Complaint in the U. S, District Court.